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*Of Attorney for Defendants*

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

**RADAGAST PET FOOD, INC.**, an  
Oregon corporation,

Plaintiff,

Case No. 3:19-cv-01467-JR

**DECLARATION OF ERIC S. POSTMA IN  
SUPPORT OF DEFENDANTS' MOTION  
TO COMPEL**

v.

**CENTINELA FEED, INC.**, a  
California corporation, and **THE  
LOTUS PET FOOD, INC.**, a  
California corporation,

Defendants.

I, Eric S. Postma, declare as follows:

1. I am of attorneys for Defendants in the above-captioned action.
2. Attached hereto as Exhibit A is a true and correct copy of correspondence dated April 22, 2019 from Elizabeth Milesnick to Defendants, Bates labeled C&L000019 to C&L00023. This document was produced in discovery and was marked as confidential; however, after review, Defendants have determined that it is appropriate for the court to be able to review this document without being under seal.
3. Attached hereto as Exhibit B is a true and correct copy of the Affidavit signed by Chris Nakagawa, President of Centinela Feed, Inc., dated June 10, 2019, Bates labeled C&L000029. This document was produced in discovery and was marked as confidential;

however, after review, Defendants have determined that it is appropriate for the court to be able to review this document without being under seal.

4. Attached hereto as Exhibit C is a true and correct copy of the Stipulated Protective Order filed on January 29, 2020.

5. Attached hereto as Exhibit D is a true and correct copy of Defendants' First Requests for Production dated February 26, 2020.

6. Attached hereto as Exhibit E is a true and correct copy of Defendants' First Set of Interrogatories to Plaintiff dated February 26, 2020.

7. Plaintiff produced a portion of the responsive documents via Dropbox on or about April 15, 2020, after Defendants' provided an extension at the request of Plaintiff's counsel.

8. Attached hereto as Exhibit F is a true and correct copy of Plaintiff's Response to Defendants' First Request for Production of Documents dated March 27, 2020.

9. Attached hereto as Exhibit G is a true and correct copy of Elizabeth Milesnick's letter dated March 13, 2020.

10. Attached hereto as Exhibit H is a true and correct copy of Elizabeth Milesnick's letter dated April 15, 2020.

11. Attached hereto as Exhibit I is a true and correct copy of Elizabeth Milesnick's letter dated August 17, 2020.

**I declare under penalty of perjury that the foregoing is true and correct.**

DATED this 21st day of September, 2020.

BITTNER & HAHS, P.C.

By: s/Eric S. Postma  
Eric S. Postma, OSB #993478  
Nathan B. Pogue, OSB #164611  
*Of Attorneys for Defendants*

1                   **CERTIFICATE OF SERVICE**

2                   I hereby certify that on the 21st day of September, 2020, I served the foregoing

3                   **DECLARATION OF ERIC S. POSTMA IN SUPPORT OF DEFENDANTS' MOTION TO**

4                   **COMPEL** on the following individuals:

5                   Elizabeth Tedesco Milesnick, OSB #050933  
6                   Idealegal  
7                   2240 N. Interstate Avenue, Suite 270  
8                   Portland, OR 97227  
9                   E: [emilesnick@idealegal.com](mailto:emilesnick@idealegal.com)

10                  and

11                  Laura Salerno Owens, OSB #076230  
12                  Adam M. Starr, OSB #125393  
13                  Molly K. Honoré, OSB #125250  
14                  Markowitz Herbold PC  
15                  1455 SW Broadway, Suite 1900  
16                  Portland, OR 97201  
17                  E: [laurasalerno@mhgm.com](mailto:laurasalerno@mhgm.com)  
18                  [adamstarr@markowitzherbold.com](mailto:adamstarr@markowitzherbold.com)  
19                  [mollyhonore@markowitzherbold.com](mailto:mollyhonore@markowitzherbold.com)

20                  *Of Attorneys for Plaintiff*

21                  by mailing to said person a complete and correct copy thereof, contained in a sealed envelope,  
22                  addressed as set forth above and deposited in the United States mail in Lake Oswego, Oregon,  
23                  with postage thereon prepaid, on said day.

24                  DATED this 21st day of September, 2020.

25                  BITTNER & HAHS, P.C.

26                  By: s/Eric S. Postma  
27                  Eric S. Postma, OSB #993478  
28                  *Of Attorneys for Defendants*